

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Gary DeLoach, individually and on behalf of all others similarly situated,

Plaintiff,

v.

DEERE & CO. (d/b/a JOHN DEERE),

Defendant.

Case No. 1:22-cv-02945

Hon. Marvin E. Aspen

**DEFENDANT DEERE & COMPANY'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Deere & Company (“John Deere”), by and through its undersigned attorneys, respectfully moves this Court for an order extending John Deere’s time to answer or otherwise plead by 30 days unless an alternative deadline is established by a case management conference or an order from the Court in the consolidated action entitled In re: Deere and Company Repair Services Antitrust Litigation, 3:22-cv-50188 pending in the Northern District of Illinois (Western Division) before the Honorable Iain D. Johnston. In support of this Motion, John Deere states as follows:

1. Plaintiff Gary DeLoach (“Plaintiff”) filed his Complaint against John Deere on or about June 6, 2022. (ECF No. 1).
2. On February 25, 2022, John Deere filed with the Judicial Panel on Multidistrict Litigation (“JPML”) a Motion to Transfer for Consolidated Proceedings the then-pending six cases against it for consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. (ECF No. 6, Exhibit A).

3. Following briefing and oral argument, on June 1, 2022, the JPML ordered the six original actions pending against John Deere to be transferred to the Northern District of Illinois (Western Division) before the Honorable Iain D. Johnston for coordinated or consolidated pretrial proceedings.

4. On June 9, 2022, John Deere filed a Notice of Potential Tag-Along Action with the JPML identifying this action as related to the other cases consolidated and transferred by the JPML. (ECF No. 6, Exhibit B).

5. By rule, John Deere's deadline to answer or otherwise plead in this action is June 28, 2022.

6. On June 23, 2022, John Deere's counsel communicated with Plaintiff's counsel regarding the relief requested herein. Plaintiff's counsel agreed to extend the time for John Deere to answer or otherwise plead by 30 days unless an alternative deadline is established by a case management conference or an order from the Court in the consolidated action entitled In re: Deere and Company Repair Services Antitrust Litigation, 3:22-cv-50188 pending in the Northern District of Illinois (Western Division) before the Honorable Iain D. Johnston. Plaintiff's counsel confirmed that Plaintiff does not oppose this motion for extension of time to answer or otherwise plead.

7. John Deere now seeks an order from this Court extending John Deere's time to answer or otherwise plead by 30 days unless an alternative deadline is established by a case management conference or an order from the Court in the consolidated action entitled In re: Deere and Company Repair Services Antitrust Litigation, 3:22-cv-50188 (Northern District of Illinois- Western Division).

8. This is the first request for additional time sought by John Deere in this action.

9. This extension is sought in good faith and not for the purposes of delay. Neither party will be prejudiced by this extension.

10. WHEREFORE, for the foregoing reasons, Defendant Deere & Company respectfully requests that this Court extend its time to answer or otherwise plead by 30 days unless an alternative deadline is established by a case management conference or an order from the Court in the consolidated action entitled In re: Deere and Company Repair Services Antitrust Litigation, 3:22-cv-50188 (Northern District of Illinois- Western Division).

Dated: June 24, 2022

Respectfully submitted,

/s/ Amanda B. Maslar

Amanda B. Maslar (6321073)  
amaslar@jonesday.com  
JONES DAY  
110 North Wacker, Suite 4800  
Chicago, IL 60606  
Telephone: (312) 782-3939  
Facsimile: (312) 782-8585

John M. Majoras\*  
jmmajoras@jonesday.com  
JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, DC 20001  
Telephone: (202) 879-3939

Tiffany Lipscomb-Jackson\*  
tdlipscombjackson@jonesday.com  
JONES DAY  
325 John H. McConnell Boulevard,  
Suite 600  
Columbus, OH 43215-2673  
Telephone: (614) 281-3876

Corey A. Lee\*  
calee@jonesday.com  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone: (216) 586-3939

*\*Pro Hac Vice Application Forthcoming*

*Counsel for Defendant Deere & Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

*/s/ Amanda B. Maslar* \_\_\_\_\_